

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Mar 17, 2020

Kathy A. Surra - States

KATHY A. SURRATT-STATES
Chief United States Bankruptcy Judge

In Re:)
FORESIGHT ENERGY, LP, et al) Case No. 20-41308
Chapter 11
Debtors.)

**VERIFIED MOTION OF ERIKA L. TODD FOR
ADMISSION PRO HAC VICE**

Pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the Local Rules of the United States District Court for the Eastern District of Missouri, ERIKA L. TODD of the firm Sullivan & Worcester, together with Marshall C. Turner of the firm Husch Blackwell LLP, and move for admission of ERIKA L. TODD *pro hac vice* in the above-captioned chapter 11 case, and in support thereof state as follows:

1. ERIKA L. TODD is an attorney in the law firm of Sullivan & Worcester, One Post Office Square, Boston, MA 02109. Her phone number is 617-338-2825. Her facsimile number is 617-338-2880 and email is etodd@sullivanlaw.com.

2. Ms. Todd is a graduate of Harvard Law School, 2013. Ms. Todd was admitted to the Bar of the Commonwealth of Massachusetts in 2013. She is also admitted to practice before the U.S. District Court, Massachusetts; U.S. Court of Appeals, 1st Circuit; U.S. Court of Federal Claims; and Supreme Court of the United States.

3. Ms. Todd is a member in good standing of all bars of which she is a member and she is not under suspension or disbarment from any bar.

4. Ms. Todd does not reside in the Eastern District of Missouri, is not regularly employed in the Eastern District of Missouri, and is not regularly engaged in the practice of law in the Eastern District of Missouri.

5. Ms. Todd will represent creditor Lord Securities Corporation, in its capacity as First Lien Term Loan Agent and Collateral Trustee, in this matter and co-counsel in this matter is Marshall C. Turner, a member in good standing of the Bar for the U.S. District Court for the Eastern District of Missouri.

WHEREFORE, ERIKA L. TODD attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that she be admitted *pro hac vice* in connection with the above-captioned case, and for such other and further relief as is just.

Dated: March 16, 2020
Boston, MA

/s/ Erika L. Todd

Erika L. Todd
Sullivan & Worcester LLP
One Post Office Square
Boston, MA 02109
Phone: (617) 338-2825
Email: etodd@sullivanlaw.com

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Marshall C. Turner
Marshall C. Turner, Esq. (#58053MO)
190 Carondelet Plaza, Suite 600
St. Louis, Missouri 63105
Telephone: (314) 480-1768
Facsimile: (314) 480-1505
marshall.turner@huschblackwell.com

Attorneys for Lord Securities Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion was filed on March 16, 2020 and that a true and correct copy of the Motion was served through this Court's CM/ECF system to all parties receiving notice thereby.

/s/ Marshall C. Turner
Marshall C. Turner

Certificate of Notice Pg 4 of 5
 United States Bankruptcy Court
 Eastern District of Missouri

In re:
 Foresight Energy LP
 Debtor

Case No. 20-41308-kss
 Chapter 11

CERTIFICATE OF NOTICE

District/off: 0865-4

User: admin
 Form ID: pdfol

Page 1 of 2
 Total Noticed: 1

Date Rcvd: Mar 17, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 19, 2020.

aty +Erika L. Todd, Sullivan & Worcester LLP, One Post Office Square, Boston, MA 02109-2129

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
 NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 19, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 17, 2020 at the address(es) listed below:

Alice Belisle Eaton on behalf of Debtor Foresight Energy LP
 aeaton@paulweiss.com; mcolarossi@paulweiss.com; pbasta@paulweiss.com; slascano@paulweiss.com; awoolve
 rton@paulweiss.com; orahnama@paulweiss.com; mtattnall@paulweiss.com; psteel@paulweiss.com; dweiss@pau
 lweiss.com
 Brad M. Kahn on behalf of Creditor Ad Hoc First Lien Group bkahn@akingump.com
 Brian C. Walsh on behalf of Creditor Davidson Kempner Capital Management LP
 brian.walsh@bclplaw.com
 Christopher J. Lawhorn on behalf of Creditor Javelin Global Commodities UK Ltd
 cjl@carmodymacdonald.com, txs@carmodymacdonald.com; aep@carmodymacdonald.com
 Ira S Dizengoff on behalf of Creditor Ad Hoc First Lien Group idizengoff@akingump.com
 Jaimie L Mansfield on behalf of Debtor Tanner Energy LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 Jaimie L Mansfield on behalf of Debtor Sugar Camp Energy, LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 Jaimie L Mansfield on behalf of Debtor Macoupin Energy LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 Jaimie L Mansfield on behalf of Debtor Williamson Energy, LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 Jaimie L Mansfield on behalf of Debtor Foresight Coal Sales LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 James Savin on behalf of Creditor Ad Hoc First Lien Group jsavin@akingump.com
 Jennifer M McLemore on behalf of Creditor Natural Resource Partners L.P., et al.
 jmclemore@williamsmullen.com
 Joel A Kunin on behalf of Creditor Cory Leitschuh jkunin@ghalaw.com, megan@ghalaw.com
 John G. Willard on behalf of Debtor Oeneus LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Mach Mining, LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Foresight Energy Labor LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Foresight Energy Finance Corporation
 jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Sitran, LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor MaRyan Mining LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Akin Energy LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Hillsboro Transport LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Adena Resources, LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com

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User: admin
Form ID: pdfol

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Total Noticed: 1

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The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

John G. Willard on behalf of Debtor Seneca Rebuild LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor American Century Transport LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor Foresight Energy LP jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John G. Willard on behalf of Debtor American Century Mineral LLC jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
John T.M. Whiteman on behalf of Creditor Missouri Department of Revenue edmoecf@dor.mo.gov
Kathryn Redmond on behalf of Debtor LD Labor Company LLC kredmond@atllp.com, bvogt@atllp.com
Kathryn Redmond on behalf of Debtor Coal Field Repair Services LLC kredmond@atllp.com, bvogt@atllp.com
Kathryn Redmond on behalf of Debtor Coal Field Construction Company LLC kredmond@atllp.com, bvogt@atllp.com
Kathryn Redmond on behalf of Debtor Logan Mining LLC kredmond@atllp.com, bvogt@atllp.com
Kathryn Redmond on behalf of Debtor Foresight Energy LP kredmond@atllp.com, bvogt@atllp.com
Mark V. Bossi on behalf of Creditor Ad Hoc First Lien Group mbossi@thompsoncoburn.com, lmckinnon@thompsoncoburn.com
Marshall C. Turner on behalf of Creditor Huntington National Bank marshall.turner@huschblackwell.com, gail.sinnett@huschblackwell.com;marshall-turner-8668@ecf.pacerpro.com
Marshall C. Turner on behalf of Creditor Lord Securities Corporation marshall.turner@huschblackwell.com, gail.sinnett@huschblackwell.com;marshall-turner-8668@ecf.pacerpro.com
Michael D Mueller on behalf of Creditor Natural Resource Partners L.P., et al. mmueller@williamsmullen.com
Office of US Trustee USTPRegion13.SL.ECF@USDJO.gov
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Richard W. Engel, Jr. on behalf of Debtor Foresight Energy GP LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
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Richard W. Engel, Jr. on behalf of Debtor Foresight Energy LP rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
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Richard W. Engel, Jr. on behalf of Debtor Hillsboro Energy LLC rengel@armstrongteasdale.com, bvogt@armstrongteasdale.com;srice@armstrongteasdale.com
Thomas H Riske on behalf of Creditor Javelin Global Commodities UK Ltd thr@carmodymacdonald.com, syd@carmodymacdonald.com;ala@carmodymacdonald.com
Timothy P. Palmer on behalf of Creditor Huntington National Bank Timothy.Palmer@BIPC.com
Wendi S. Alper-Pressman on behalf of Creditor Natural Resource Partners L.P., et al. wpressman@lathropgpage.com, jbuchheit@lathropgpage.com, stlfilings@lathropgpage.com,
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TOTAL: 51